

1 **LAW OFFICES OF DALE K. GALIPO**
Dale K. Galipo (SBN 144074)
2 dalekgalipo@yahoo.com
Cooper Alison-Mayne (SBN 343169)
3 cmayne@galipolaw.com
21800 Burbank Boulevard, Suite 310
4 Woodland Hills, CA 91367
Phone: (818) 347-3333
5 Attorneys for Plaintiffs

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10 URSULA BYRAM, S.B. by and
11 through guardian ad litem TIMOTHY
12 BYRAM, N.B. by and through guardian
ad litem TIMOTHY BYRAM, and A.B.
13 by and through guardian ad litem
KAITLYN HUMENCHUK,
14 individually and as successors-in-
interest to Everett Byram.

15 | Plaintiffs.

16

**17 COUNTY OF LOS ANGELES,
18 BLAKE RUNGE, and BRENDA
ALCANTARA.**

19 Defendants.

Case No. 2:23-cv-09285-KS

**JOINT STIPULATION FOR
ORDER CONTINUING
DEADLINES FOR TRIAL FILINGS**

[Assigned to Hon. Karen L. Stevenson,
Courtroom 580]

Trial Date: 02/10/2025

20
21 TO THE HONORABLE COURT, ALL PARTIES, AND TO THEIR
22 COUNSEL OF RECORD:

Plaintiffs Ursula Byram, S.B. by and through guardian ad litem Timothy Byram, N.B. by and through guardian ad litem Timothy Byram, and A.B. by and through guardian ad litem Kaitlyn Humenchuk and Defendants County of Los Angeles, Blake Runge and Brenda Alcantara (collectively “Parties”), through their respective attorneys of record, hereby stipulate to the following:

1 1. This request for a continuance of the trial filing deadlines is made
 2 because the Parties have scheduled a mediation for October 25, 2024, which occurs
 3 after the current trial filing deadlines.

4 2. The Parties have met and conferred and agree that continuing the trial
 5 filing deadlines will allow them to focus their efforts on the mediation process and
 6 avoid expending resources on trial preparation that may prove unnecessary if the case
 7 settles.

8 3. Good cause exists for this continuation given that preparing trial
 9 documents before the scheduled mediation would be premature and potentially
 10 unnecessary if the case settles through mediation.

11 4. Additionally, the Parties have noticed an error in the current scheduling
 12 order (ECF No. 70) regarding the Post-Settlement Status Conference and Joint Status
 13 Report dates, stemming from a typo in the Parties' previous request (ECF No. 69).
 14 The Joint Status Report should be due 7 days *before* the Conference, not *after*, as is
 15 clear from the Court's previous Order at ECF No. 68-1. The Parties request the Court
 16 amend the scheduling order to correct this mistake.

17 5. Working together, the Parties agree to amend the scheduling order as
 18 follows:

	Current Deadline	Proposed Deadline
Trial Filings (First Set) Deadline	October 8, 2024	November 12, 2024
Trial Filings (Second Set) Deadline	October 22, 2024	November 26, 2024
Joint Status Report (Due 7 days before Post-Settlement Status Conf.)	November 22, 2024	November 15, 2024
Post-Settlement Status Conference	November 15, 2024	November 22, 2024
Trial (Mon, 8 a.m.)	February 10, 2025	UNCHANGED
Pretrial Conference (Tues, 10:00 a.m.)	January 21, 2025	UNCHANGED

	Current Deadline	Proposed Deadline
Discovery Deadline – Expert	December 11, 2024	UNCHANGED
Settlement Conference Deadline	November 15, 2024	UNCHANGED

The Parties have previously filed one request to change the scheduling order (ECF No. 69), which was granted by the Court on August 26, 2024 (ECF No. 70). ***The parties do not request a continuance of the Trial date or the Final Pretrial Conference date.***

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: October 3, 2024

THE LAW OFFICES OF DALE K. GALIPO

By Cooper Alison-Mayne

DALE K. GALIPO

COOPER ALISON-MAYNE

Attorneys for Plaintiffs

DATED: October 3, 2024

HURRELL CANTRALL LLP

By: /s/Jordan S. Stern

THOMAS C. HURRELL

JORDAN S. STERN

NICOLE G. ORTEGA

Attorneys for Defendants, COUNTY OF
LOS ANGELES, BLAKE RUNGE and
BRENDA ALCANTARA